

## **REMARKS**

### **Claim Status**

Claims 1-6 are currently pending, with claims 1 and 6 being the only independent claims. Claim 1 has been amended. No new matter has been added. Reconsideration of the application, as amended, is respectfully requested.

### **Overview of the Office Action**

Claim 1 has been objected to because of a minor informality. Withdrawal of this objection is in order, as explained below.

Claims 1-6 stand rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. Withdrawal of this rejection is in order, as explained below.

Claims 1-6 stand rejected under 35 U.S.C. §102(e) as anticipated by U.S. Publication No. 2002/0002591 ("*Ketola*").

Claims 1-6 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Publication No. 2003/0123423 ("*Okanoue*").

Applicants have carefully considered the Examiner's rejection, and the comments provided in support thereof, and respectfully disagree with the Examiner's analysis. For the reasons which follow, it is respectfully submitted that all claims of the present application are patentable over the cited references.

### **Amendments Addressing Formalities**

Claim 1 was objected to because of the use of the term "adapted to". In response to this objection, claim 1 has been amended in a manner that is self-explanatory. Withdrawal of this objection is therefore in order.

**Patentability of Claims 1-6 under 35 U.S.C. §112, First Paragraph**

The Examiner (page 2-3 of the Office Action) asserts that there is no written description for the limitation “non-unique address via the associated addressing”.

With respect to the foregoing, the term “non-unique address via the associated addressing” is defined in the ETSI standard described at paragraph [0014] of U.S. Publication No. 2005/0250480, which requires simultaneous connection of an identical terminal to several networks for communicating. However, the ETSI standard fails to provide a way to accomplish such a result. Paragraphs [0014] thru [0017] of the instant publication explain that a network sends an address to a terminal. Paragraph [0019] of the instant publication further describes an addressing problem associated with the reception of two (or more) identical addresses (i.e. non-unique addresses). In the claimed invention, each network interface is associated with one address that originates from one specific network. This concept is described at paragraphs [0068] thru [0070] of the instant publication (see “only one address”). Without the advantages provided by the claimed invention, a “normal” terminal can only work with a unique addressing scheme having different addresses so as not to violate the principle of unique addressing (see, for example, paragraphs [0071] to [0072] of the instant publication). As described at paragraph [0073] of the instant publication, the claimed invention permits a terminal to operate even with reception of the same address (see par. [0073]) and use of the same addressing scheme (see par. [0075]), and it can receive two identical addresses (see par. [0074]). In view of the foregoing, the term “non-unique address via the associated addressing” is well supported by the written description. Withdrawal of the rejection is, therefore, in order.

## Patentability of the Claims under 35 U.S.C. §102

The Examiner (pg. 3 thru 4 of the Office Action) contends that:

Ketola teaches a system for managing a set of architectures of a terminal dedicated to a plurality communication networks ... said system comprises ... at least one dedicated architecture manager integrated into said terminal ... adapted to manage independently a plurality of said communication networks ***after receiving a non-unique address via the associated addressing scheme*** from each of said networks connected to the terminal (fig. 1, para. 0026-0027,0029). (Emphasis Added)

With respect to the foregoing, Applicants respectfully assert that *Ketola* fails to teach or suggest the invention recited in independent claim 1. *Ketola* discloses “a system for controlling at least a first (3a) and a second remote mailbox (3a, 3b) located in at least one e-mail server (2a, 2b), in a terminal (1)” (see Abstract; Fig. 1).

*Ketola* (paragraph [0026]) teaches that it is possible to communicate with an Intranet of a company, which is protected with a firewall, and with the public Internet so as to control several remote mailboxes simultaneously. *Ketola* (paragraph [0027]; FIG. 1) teaches a system in which two mailboxes 3a, 3b are controlled simultaneously. *Ketola* (paragraph [0027], lines 3-7) states that “a first PDP connection PDP1 is set up from a wireless communication device 1 to an e-mail server 2a located in the Internet network, in which server the user of the wireless communication device has at least a first remote mailbox 3a”. *Ketola* (paragraph [0027], lines 8-11) further states that “a second PDP connection PDP2 is set up from the wireless communication device to an e-mail server 2b located in an internal Intranet of a company, in which server the user has a second remote mailbox 3b”. Consequently, *Ketola* teaches a system that operates in accordance with the recommendations of the ETSI standard described at paragraph [0014] of Applicants’ published application.

*Ketola* teaches addresses that are different when the terminal operates with only one network and with several mailboxes of this unique network (see paragraph [0016]). However, *Ketola* fails to teach or suggest how the addresses of the different networks are managed when the terminal is simultaneously connected to several network. In particular, *Ketola* fails to teach or suggest anything with respect to problems associated with the reception of an identical address (i.e., a non unique address) from two different networks that both operate with the same addressing scheme.

*Ketola* (paragraph [0029]) teaches the separation of different remote mailboxes and the related messages within the user interface when several remote mailboxes are controlled simultaneously. *Ketola* (paragraph [0029], lines 4-6) states that “this can be implemented for example by indicating the mailbox in which the message in question belongs to in connection with each e-mail”. *Ketola* (paragraph [0029], lines 8-13) teaches that another alternative is to place the messages belonging to different remote mailboxes into different windows, displays or under menus, wherein the remote mailbox on view is indicated, for example, in the upper edge of the display, or by restricting the alternatives to the alternative in use at a given time. *Ketola* thus teaches separation of the presentation into different mailboxes, wherein the terminal can recognize the data coming from the different mailboxes only when the addresses are different.

However, independent claim 1 of the present application recites that “a non-unique address via the associated addressing scheme from each of said networks connected to the terminal (10)” is received. Independent claim 6 recites the step of “independently managing a plurality of said communications networks after receiving a non-unique address from each of said networks connected to said terminal”. *Ketola* fails to teach or suggest these limitations.

In view of the foregoing, *Ketola* fails to anticipate independent claims 1 and 6. Reconsideration and withdrawal of the rejection under 35 U.S.C. §102 is therefore respectfully requested.

The Examiner contends that *Okanoue* teaches the claimed invention recited in independent claims 1 and 6. However, *Okanoue* does not qualify as prior art against the present application. Applicants have claimed priority benefit of French application no. 02/07457 filed June 17, 2002. In order to perfect this claim for priority benefit, submitted herewith is a certified English translation of the priority document. The Declaration of Andrew Scott Marland certifies that the attached translation is a true and correct translation of French application no. 02/07457. Thus, the claim for priority benefit has been perfected and the present application is entitled to benefit from the priority date of June 17, 2002.

*Okanoue* has a filing date of December 4, 2002, which is subsequent to the June 17, 2002 priority date of the present application. Therefore, as stated previously, *Okanoue* does not qualify as prior art against the present application.

In view of the foregoing, reconsideration and withdrawal of the rejection under 35 U.S.C. §102 is respectfully requested.

Moreover, due to the fundamental above-discussed differences between each of independent claims 1 and 6 and *Ketola*, it is clear that claims 1 and 6 are unobvious over this reference under 35 U.S.C. §103.

#### **Dependent claims**

Claims 2-5 are dependent from claim 1. In view of the patentability of independent claim 1, for the reasons presented above, each of dependent claims 2-5 is patentable therewith over the prior art. Moreover, each of these claims includes features which serve to even more clearly distinguish the invention over the prior art.

**Conclusion**

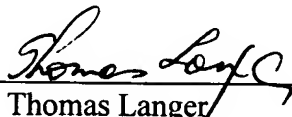
Based on all of the above, it is respectfully submitted that the present application is now in proper condition for allowance. Prompt and favorable action to this effect and early passing of this application to issue are respectfully solicited.

Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned in order to facilitate reaching a resolution of any outstanding issues.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,  
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